

cited references disclose a method of adding a noble gas into the crystalline semiconductor film. The Examiner appears to be combining the teachings of two references in which the disclosed semiconductor layers are different. Further, the Examiner's reliance on the disclosure that Henley teaches annealing the semiconductor layer disclosed therein does not overcome this deficiency in the rejection, since the annealing step is for a gettering layer and not for crystallizing. Therefore, the Examiner is relying on piece-meal reconstruction, which is not proper. "One cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention." *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed.Cir. 1988).

Even if these two references could properly be combined, one of skill in the art would not be motivated to add the noble gas of Henley as a catalyst because none of the cited references teach or suggest that a noble gas is effective as a catalyst element for crystallizing an amorphous silicon film. Applicants contend that it would not be obvious to substitute a noble gas of Henley, which is not surely effective for a catalyst element of Makita.

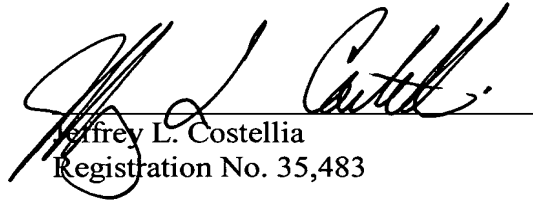
Moreover, claims 6 and 28 recite that a step of irradiating the crystalline semiconductor film with laser light to improve crystallinity is conducted before a step of segregating the metal element in the impurity region. Similarly, claims 17 and 39 recite that a step of irradiating the crystalline semiconductor film with laser light to improve crystallinity is conducted before a step of removing the impurity region by etching.

On the other hand, it appears that Makita fails to teach this feature. It should be noted that Makita discloses that a step of irradiating a laser beam to improve crystallinity of the crystalline silicon film is conducted after a step of removing the impurity region. Therefore, Applicants contend for the reasons advanced above that the claim rejection under 35 U.S.C. 103(a) should be withdrawn.

In view of the foregoing, it is respectfully requested that the rejection of record be reconsidered and withdrawn, that claims 6-22 and 28-44 be allowed, and that the application be passed to issue. If a conference would be beneficial in expediting the prosecution of the instant application, the Examiner is hereby invited to telephone the undersigned to arrange such a conference.

The Commissioner is hereby authorized to charge any fees which may be further required in this application, except the issue fee, or credit any overpayment to Deposit Account No. 19-2380 (740756-2410), under the above order number.

Respectfully submitted,



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